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⊕EPA

Hazardous Waste Operations and Emergency Response:

General Information and Comparison

Office of Emergency and Remedial Response Emergency Response Division MS-101

Quick Reference Fact Sheet

INTRODUCTION



Under the authority of section 126 of the Superfund Amendments and Reauthorization Act of 1986 (SARA Title I), the U.S. Environmental Protection Agency (EPA) and the U.S. Occupational Safety and

Health Administration (OSHA) issued *identical* health and safety standards to protect workers engaged in hazardous waste operations and emergency response. The OSHA regulations, codified at 29 CFR 1910.120, became effective on March 6, 1990 (54 FR 9294). Corrections to these regulations were published on April 13, 1990 (55 FR 14072) to clarify certain medical surveillance requirements and to identify which employers must comply with 29 CFR 1910.120(p). The EPA regulations, published on June 23, 1989 at 54 FR 26654, incorporate the OSHA standards by reference and are codified at 40 CFR Part 311.

The EPA and OSHA worker protection standards for hazardous waste operations and emergency response (HAZWOPER) affect employers whose employees are engaged in the following activities:

Clean-up operations at uncontrolled hazardous waste sites when a government authority requires the cleanup (29 CFR 1910.120(a)(i));

Corrective actions at treatment, storage, and disposal (TSD) facilities regulated under the Resource Conservation and Recovery Act (RCRA) (29 CFR 1910.120(a)(ii));

- Voluntary clean-up operations at uncontrolled hazardous waste sites (29 CFR 1910.120(a)(iii));
- Hazardous waste operations conducted at RCRA TSD facilities (29 CFR 1910.120(a)(iv)); and
- Emergency response operations without regard to location, where there is the release or a substantial threat of release of a hazardous substance (29 CFR 1910.120(a)(v)).

The purpose of this Fact Sheet is to explain the scope and purpose of the worker protection standards issued under SARA Title I, and to distinguish these standards from other regulations and consensus standards covering the same or similar subject matter. This Fact Sheet is also designed to facilitate compliance with the HAZWOPER requirements by helping employers and other interested readers to understand their special responsibilities under these worker protection standards. For a summary of the HAZWOPER requirements, refer to Exhibit 1.

This Fact Sheet is divided into five sections. Section one gives a brief legislative history of the EPA and OSHA worker protection standards for hazardous waste operations and emergency response, and explains the responsibilities of these two agencies in implementing the standards. Sections two, three, and four compare the 1910.120 standards with other programs governing the same kinds of activities. Finally, section five explains how to obtain the publications discussed in this Fact Sheet.

EXHIBIT 1

The Worker Protection Standards for Hazardous Waste Operations and Emergency Response (29 CFR 1910.120)

- (a) Scope, application, and definitions.
- (b) Safety and health program.
- (c) Site characterization and analysis.
- (d) Site control.
- (e) Training.
- Medical surveillance.
- (g) Engineering controls, work practices, and personal protective equipment for employee protection.
- (h) Monitoring.
- (i) Informational programs.
- Handling drums and containers.
- (k) Decontamination.
- Emergency response by employees at uncontrolled hazardous waste sites.
- (m) Illumination.
- (n) Sanitation at temporary workplaces.
- (o) New technology programs.
- (p) Certain operations conducted under the Resource Conservation and Recovery Act of 1976.
- Emergency response to hazardous substance releases by employees not previously covered.



Overview of EPA and OSHA Worker Protection Authority

The Occupational Safety and Health Act of 1970, as

amended, (OSH Act) established health and safety standards for the American workplace. Section 6 of the OSH Act established Federal authority to issue general health and safety standards for private industry; section 19 addresses standards for

Under the Federal government employees. authority of section 6 of the OSH Act, OSHA promulgated general industry standards and standards that apply specifically to the construction industry; these standards are codified at 29 CFR 1910 and 1926, respectively. These standards set forth the minimum health and safety requirements necessary to ensure protection for all private sector employees in the United States. The scope of the coverage of the standards set forth in 29 CFR 1910 and 1926 changed dramatically on February 26, 1980, when President Jimmy Carter signed Executive Order 12196, requiring the Federal government to comply with the more stringent general industry standards issued under section 6 of the OSH Act.

SARA section 126(a) requires the Secretary of Labor to issue health and safety standards under section 6 of the OSH Act for the benefit of private sector employees -- and through the Executive Order, Federal employees -- engaged in hazardous waste operations and emergency response. Federal OSHA has no authority to enforce regulations protecting state and local government employees.

Under section 18 of the OSH Act, a state may elect to develop and implement its own occupational safety and health program if: (1) the state is willing to document its program in a state plan, and (2) the state's requirements are at least as stringent as the Federal regulations. Before a state program can become effective, however, OSHA must review and approve the state plan. Through its review and approval authority, OSHA requires states to extend occupational safety and health protection to state and local government employees, as well as to private sector employees, within the state's jurisdiction. Currently, there are 23 states and two territories with delegated OSHA programs. These state plans must be amended to incorporate the newly promulgated standards in 29 CFR 1910.120, to address the safety and health of employees engaged in hazardous waste operations and emergency response.

SARA section 126(f) requires the EPA Administrator to issue standards for hazardous waste operations and emergency response that are *identical* to OSHA's standards. Although the two sets of standards contain identical *substantive* provisions, EPA and OSHA address different *audiences*. EPA's authority extends to state and local government employers conducting hazardous waste operations and emergency response in states

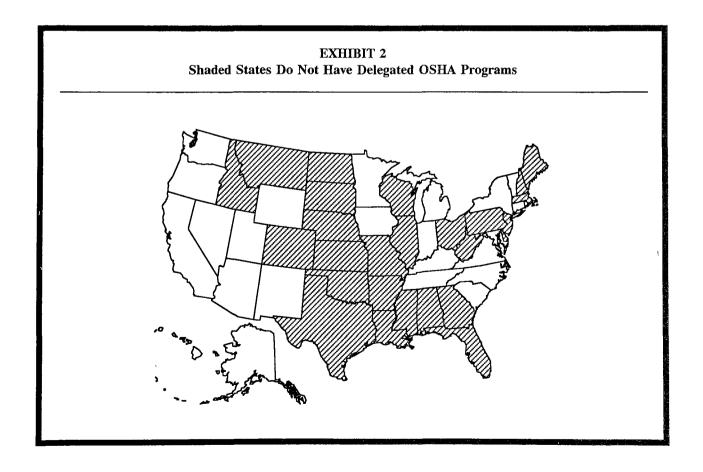
that do not have in effect a delegated OSHA program. Currently, 27 states, one territory, and the District of Columbia fall under EPA's authority. The EPA regulations cover both compensated and uncompensated state and local government employees engaged in the covered activities. Therefore, the EPA standards protect volunteers, such as volunteer fire fighters who are responding to hazardous substance emergencies. Although Federal OSHA recommends that delegated state programs cover also uncompensated employees, not all states have followed this recommendation.

In summary, in states without an OSHA-approved plan, Federal OSHA standards protect all private sector and Federal employees engaged in hazardous waste operations and emergency response; the EPA worker protection standards protect all state and local government employees, including volunteer workers. In states with an OSHA-approved plan, the state program covers all private sector employees, as well as state and local government employees; Federal OSHA covers Federal employees in those states. The shaded area in Exhibit 2 shows jurisdictions without an OSHA-delegated program.

Inter-Agency Agreement

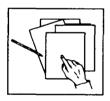
EPA and OSHA have an agreement to share responsibility for implementing the Title I worker protection standards. Under the terms of this agreement, OSHA performs the following activities:

- Support of the National Response Team and Regional Response Teams.
- Technical Assistance. OSHA advises EPA
 on the types of actions EPA should take at
 uncontrolled hazardous waste sites to
 ensure full compliance with the
 HAZWOPER requirements. As an advisor,
 OSHA will identify problems that EPA may
 face and suggest appropriate solutions.
- Compliance Activities. OSHA conducts inspections and takes enforcement actions to ensure compliance with the worker protection standards at Superfund sites.
- Implementation Activities. OSHA supports EPA in conducting workshops to explain the requirements of the standards, and provides official interpretations of the health and safety requirements.



If you have questions on the substance of the worker protection standards for hazardous waste operations and emergency response, contact an OSHA Regional Office or OSHA's Office of Health Compliance Assistance in Washington, D.C. Refer to Exhibit 4 for relevant addresses and telephone numbers.

The next three sections of this Fact Sheet compare OSHA's health and safety standards for hazardous waste operations and emergency response with several related regulations, standards, and guidelines developed by OSHA, EPA, and the National Fire Protection Association (NFPA). Be aware that in the context of this discussion, we will talk about "hazardous substances," "extremely hazardous substances" (EHSs), "hazardous materials," "hazardous wastes," and "highly hazardous chemicals." Each of these terms means something different, and the regulatory programs that employ them are intended to prevent or mitigate the effects from exposure to a distinct set of hazardous chemicals.



Comparing Regulatory Requirements Under SARA Title I, SARA Title III, and OSHA's Proposed Rule on Highly Hazardous Chemicals

SARA Title I

Under the authority of Title I, section 126 of SARA, EPA published worker protection standards for hazardous waste operations and emergency response (HAZWOPER). HAZWOPER specifies certain health and safety requirements to ensure the protection of employees engaged in hazardous waste operations and emergency response during five specified activities (see page 1 of this Fact Sheet). HAZWOPER does not address emergency responders who engage only in handling traditional fire and medical emergencies; other OSHA programs protect these employees. HAZWOPER. however, requires that an employer provide, among other things, proper emergency response planning, training, and medical surveillance. workers must be protected during the entire

remedial process, from the preliminary evaluation and initial site entry to final closure of the site.

Emergency Response Planning. An employer must develop an emergency response plan to protect workers in an emergency resulting from the release of all kinds of hazardous substances, including EHSs, CERCLA hazardous substances, RCRA hazardous wastes, and any substance listed by the U.S. Department of Transportation as a hazardous material.

Training. An employer also must ensure that workers receive the kind of training specified in the regulation. The standard reflects a tiered approach to training, linking the amount and type of training to an employee's potential for exposure to hazardous substances and to other health hazards during a hazardous waste operation or an emergency response. The greater the potential hazard, the more extensive and stringent are the training requirements.

Medical Surveillance. **HAZWOPER** establishes a framework for a medical monitoring program for certain workers engaged in hazardous waste operations and emergency response. The medical surveillance requirements include provisions for a baseline, periodic, and termination medical examination for specific groups of employees. HAZWOPER also requires that employees receive a medical examination as soon as possible if they are injured or become ill from exposure to hazardous substances on-site or during an emergency, or develop signs or symptoms that indicate a possible overexposure to hazardous substances. Although an attending physician may determine the content of medical examinations required under the standard, the examination must address key elements related to handling hazardous substances.

SARA Title III

SARA Title III, or the Emergency Planning and Community Right-to-Know Act, is a law enacted to improve state and local government capacity to respond to an emergency caused by an accidental release of an EHS; and to disseminate information to the public on dangerous chemicals made, used, or stored in their community.

Think of this law as having four main parts. The first part, sections 302 and 303, requires each state to create a State Emergency Response

Commission (SERC). In turn, these SERCs must create Local Emergency Planning Committees (LEPCs) that correspond to local emergency planning districts. LEPCs develop and update emergency response plans for accidents involving EHSs; and receive, manage, and provide public access to information about toxic and other hazardous substances in the district. SERCs review emergency response plans, and generally supervise and coordinate LEPC activities.

The second part of SARA Title III (section 304) sets out emergency release reporting requirements. Under this part of the law, the owner or operator of a facility from which an EHS or CERCLA hazardous substance is released at or above a reportable quantity (RQ) must notify SERCs and LEPCs in the affected area by telephone. There must be a written follow-up report to this immediate notification. Both the initial and follow-up reports must give details on known or anticipated health risks and advice regarding medical attention.

The third part of SARA Title III (sections 311 and 312) gives people the right to know what substances are being made, used, or stored in their communities. The OSHA Hazard Communication Standard (HCS) requires owners and operators to keep "material safety data sheets" (or MSDSs) with information about the health hazards of chemicals at the facility, and to make these MSDSs available to their employees. SARA Title III piggy-backs on the MSDS requirements in the HCS. Under SARA Title III, the owner or operator also must send copies of MSDSs, or lists of chemicals with MSDSs, to SERCs, LEPCs, and fire departments. LEPCs, in turn, make this information available to the public during normal business hours.

The final part of SARA Title III (section 313) requires certain owners and operators to report toxic substances released from their facility -- whether the release is routine or accidental; and to report toxic substances they transport to another site as waste.

Of these four parts, the one that most closely parallels the SARA Title I worker protection standards is the part dealing with emergency response planning (section 303). There are nine emergency response planning elements in section 303 of SARA Title III. Although these planning elements do not correspond point-forpoint with the emergency response planning elements in the worker protection standards issued

under SARA Title I, each program covers similar subjects. Title I (HAZWOPER) and Title III emergency response planning elements both:

- Highlight the need for planning *before* there is an emergency;
- Require planners to identify emergency response decision-makers and other personnel;
- Require planners to develop guidelines for recognizing and evaluating releases;
- Require evacuation planning;
- Require that the emergency response plan set out an orderly sequence of steps to follow in an emergency;
- Direct planners to specify equipment that may be needed for various levels and types of emergencies; and
- Require testing the plan and providing appropriate training for emergency responders.

On the other hand, there are some important differences in emergency response planning requirements under Title I and Title III. For example, a Title I plan must address a number of chemical hazards, while a Title III plan must cover only those emergencies arising from the release of an EHS. Further, a plan to protect employees under Title I may require far more specificity than a Title III plan. Although a Title III plan may be too general for use as an employer's Title I plan, the Title I plan may reference the Title III plan to avoid any unnecessary duplication of information. If a Title III plan is referenced, a copy of the referenced document must be kept with the Title I plan.

The most important thing to remember in distinguishing Title I and Title III emergency response planning is that Title I plans focus on worker safety; Title III plans focus on community safety. The similarities and differences between the Title I and Title III emergency response planning requirements are addressed in greater detail in a paper entitled "SARA Title I/Title III Emergency Response Planning Requirements." To obtain a copy of this document, contact the Environmental Response Team (ERT) of EPA in

Edison, New Jersey. (Refer to Exhibit 4 for the appropriate address and telephone number.)

OSHA's Highly Hazardous Chemicals NPRM

On July 17, 1990, OSHA published a Notice of Proposed Rulemaking (NPRM), proposing a entitled "Process regulation Safety Management of Highly Hazardous Chemicals" (55 FR 29150). The NPRM proposes requirements that will eliminate or mitigate the harm to employees as a consequence of chemical releases during the manufacturing or processing of highly hazardous chemicals. OSHA's proposed rule emphasizes management of hazards associated with highly hazardous chemicals, and defines a "highly hazardous chemical" as:

A substance possessing toxic, flammable, reactive, or explosive properties.

The NPRM identifies 140 highly hazardous chemicals and proposes threshold quantities for each of the listed chemicals. The proposed requirements are similar to the worker protection standards issued under SARA Title I and the self-implementing provisions of SARA Title III in that each of these programs contains requirements for emergency response planning and employee training.

The NPRM requires an employer to establish and implement an emergency action plan under 29 CFR 1910.38(a). An emergency action plan must include an evacuation plan through which an employer identifies persons responsible for an orderly exit and work area check in the event of an emergency; and directs employees to leave an emergency incident site, maintain a safe distance, and call an appropriate emergency response organization. However, if an employer's highly hazardous chemical operation falls within one of the activities covered by HAZWOPER, the emergency response planning elements of 1910.120 apply. (Under HAZWOPER, an employer also may prepare a 1910.38(a) plan if the employer does not allow employees to respond to an emergency. If employees are allowed to respond, however, a more detailed emergency response plan is required.) Title I, Title III, and the Highly Hazardous Chemicals NPRM also require training for workers commensurate with their assigned duties.



Comparing General Requirements Under 29 CFR Parts 1910 and 1926 with the Particular Requirements of 29 CFR 1910.120

The occupational safety and health standards published in 29 CFR set out minimum requirements to ensure protection for all private sector employees in the United States. The general industry standards contained in Part 1910 of Title 29 were derived largely from standards developed by industry consensus organizations and non-OSHA Federal safety and health standards. The 1910 requirements reflect practices already recognized in most industrial sectors before there was an Occupational Safety and Health Administration. Part 1910, however, makes those practices mandatory.

Many of the Part 1910 standards set out generic specifications for worker tools, tolerances and specifications for industrial structures, requirements for installing equipment that make the workplace safer (e.g., sprinkler systems), rules for providing medical attention, and other general health and safety practices applicable to all types of employment. Other sections in Part 1910, however, are specific to an identified activity or industry; HAZWOPER is an example of the latter type of standard.

Section 1910.120 (HAZWOPER) contains specific requirements to minimize the health and safety hazards associated with conducting hazardous waste operations and emergency response at uncontrolled hazardous waste sites and RCRA TSD facilities, and performing emergency response operations without regard for location. In some instances, 1910.120 incorporates general worker protection provisions by reference. For example, 1910.120(g), Engineering controls, work practices, and personal protective equipment for employee protection, requires employers engaged in hazardous waste operations and emergency response to follow the provisions in 1910.94 through 1910.100 in setting up controls to protect employees from exposure to hazardous substances and safety and health hazards. Those referenced sections may apply to other industries and activities as well, but HAZWOPER applies only to hazardous waste operations and emergency response during the covered activities and locations.

If ever there appears to be a conflict between the general industry standards in 1910 or 1926 and HAZWOPER, the HAZWOPER requirements take precedent during the covered activities.

In addition to the requirements set forth under Part 1910, OSHA codified regulations in 29 CFR 1926 Subpart C that set forth safety and health standards specifically applicable to the construction industry. Part 1926 Subpart C includes safety standards for worker tools, and other standards relevant to health and safety in the construction environment (e.g., 29 CFR 1926.21 addresses programs for the education and training of employees and employers).

Parts 1910 and 1926 both require employers to provide whatever training and education is appropriate for employees to perform a given task safely. Appendix B in EPA's Health and Safety Audit Guidelines briefly summarizes the OSHA standards in 1910 and 1926 that may be most applicable to hazardous waste site activities; Exhibit 3 presents a list of these OSHA standards. For additional information on the standards listed in Exhibit 3 or on other OSHA standards, contact your local OSHA Regional Office. (Refer to Exhibit 4 for relevant addresses and telephone numbers.)



Comparing the Section 1910.120 Standards and the NFPA's Hazardous Materials Incidents Publications

Private organizations sometimes publish consensus documents addressing subject matter covered in Federal regulations. The National Fire Protection Association (NFPA) has published two highly relevant documents: Recommended Practice for Responding to Hazardous Materials Incidents (NFPA 471), and Standard for Professional Competence of Responders to Hazardous Materials Incidents (NFPA 472). The NFPA standards are not Federal regulations.

EXHIBIT 3 Other Potentially Applicable OSHA Standards (by section in 29 CFR)

1910.20	Access to Employee Exposure and
	Medical Records
1910.24	Fixed Industrial Stairs
1910.27	Fixed Ladders
1910.28	Safety Requirements for Scaffolding
1910.38	Employee Emergency Plans and
	Fire Prevention Plans
1910.57	Ventilation
1910.95	Occupational Noise Exposure
1910.101	Compressed Gases
1910.133	Eye and Face Protection
1910.134	Respiratory Protection
1910.135	Occupational Head Protection
1910.136	Occupational Foot Protection
1910.141	Sanitation
1910.151	Medical Services and First Aid
1910.165	Employee Alarm Systems
1910.181	Derricks
1910.252	Welding, Cutting, and Brazing
1910.307	Hazardous Locations
1910.1000	Toxic and Hazardous Substances
1910.1200	Hazard Communication
1926.20	General Safety and Health
	Provisions
1926.21	Safety Training and Education
1926.56	Illumination
1926.59	Hazard Communication
1926.151	Fire Prevention
1926.152	Flammable and Combustible
•	Liquids
1926.200	Accident Prevention Signs and Tags
1926.301	Hand Tools
1926.651	Specific Excavation Requirements
1926.652	Trenching Requirements
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NFPA 471 offers guidance in identifying the minimum competencies a responsible authority should attain before responding to a hazardous materials incident, and specifies operating guidelines for a response. Like HAZWOPER, NFPA 471 covers, among other things, planning for an emergency response, ensuring that responders have the proper equipment at their disposal, and conducting an emergency response.

NFPA 472 is a competency standard for workers who respond to hazardous materials incidents. NFPA 472 training criteria differ from the 1910.120 standards in that the former do not

establish specific hourly training requirements for emergency response personnel. There is no Incident Commander category in NFPA 472, but an Appendix to the standard does identify the role of an Incident Commander.

Indeed, the NFPA publications on hazardous materials incident response are similar in approach and breadth of coverage to HAZWOPER. In many instances, NFPA references the Federal standards. You must remember, however, that although the NFPA documents provide useful guidance to emergency response planners and responders, only the EPA and OSHA standards are mandatory Federal standards. If your organization falls within the scope of 29 CFR 1910.120, you must comply. Therefore, in any conflict between the NFPA Standard/Practice and the Title I worker protection standards, the Federal standards govern.



Where to Get Information and Publications

You can get any volume of the CFR by contacting the U.S.

Government Printing Office (GPO) or any Federal Depository Library in your state. To contact GPO, call or write:

Superintendent of Documents Government Printing Office (GPO) Washington, D.C. 20402 (202) 783-3238

Many state college and university libraries are also Federal Depository Libraries. For a complete list of these libraries, ask GPO for A Directory of U.S. Government Libraries.

OSHA offers a catalogue listing Agency-issued publications and audiovisual aids that help employers and other interested persons to understand both the scope of OSHA regulations, and specific substantive provisions in health and safety standards. You can obtain a free copy of the catalogue, OSHA Publications and Audiovisual Programs, by sending your request with a self-addressed mailing label to:

U.S. Department of Labor, OSHA Publications Office, Room N3101 200 Constitution Avenue, NW Washington, D.C. 20210 To get a copy of the NFPA publications discussed in this Fact Sheet, or to obtain additional information on the substance of the publications, write:

National Fire Protection Association (NFPA)

1 Batterymarch Park
P.O. Box 9101
Quincy, MA 02269-9904

For additional information on the SARA Title III requirements, contact the Emergency Planning and Community-Right-to-Know Hotline. The telephone numbers for the Hotline are: toll-free 800-535-7672, or 202-475-9652 in the Washington, D.C. area.

Currently, there are four other Fact Sheets that are available on the worker protection standards for hazardous waste operations and emergency response:

- -- Hazardous Waste Operations and Emergency Response: Uncontrolled Hazardous Waste Sites and RCRA Corrective Action (Pub. No. 9285.2-08FS) explains the specific requirements for hazardous waste operations conducted at uncontrolled hazardous waste sites, including corrective actions at RCRA TSD facilities.
- -- Establishing Work Zones at Uncontrolled Hazardous Waste Sites (Pub. No. 9285.2-06FS) describes the requirements and procedures for establishing support zones at uncontrolled hazardous waste sites.
- Hazardous Waste Operations and Emergency Response: RCRA TSD and Emergency Response Without Regard to Location (Pub. No. 9285.2-07FS) describes the principal requirements of the standards for hazardous waste operations at RCRA TSD facilities and emergency response operations without regard to location.
- -- Hazardous Waste Operations and Emergency Response: Available Guidance (Pub. No. 9285.2-10FS) describes guidance materials

developed by the Environmental Response Team to help workers engaged in hazardous waste operations and emergency response understand the HAZWOPER requirements.

Copies of these Fact Sheets may be obtained by calling or writing the Environmental Response Team of EPA in Edison, New Jersey. (Refer to Exhibit 4 for the appropriate address and telephone numbers.) Please specify the title and publication number of the Fact Sheet(s).

EXHIBIT 4 Important Telephone Numbers and Addresses

- U.S. EPA/ERT
 2890 Woodbridge Avenue
 Building 18 (MS-101)
 Edison, NJ 08837-3679
 (908) 321-6740 or (FTS) 340-6740
- U.S. Department of Labor, OSHA
 Office of Health Compliance Assistance
 200 Constitution Avenue, NW
 Washington, D.C. 20210
 (202) 523-8036 or (FTS) 523-8036

OSHA Regional Offices

- U.S. Department of Labor, OSHA Region 1
 133 Portland Street, 1st Floor Boston, MA 02114
 (617) 565-7164 or (FTS) 835-7164
- U.S. Department of Labor, OSHA Region 2
 201 Varick Street, Room 670 New York, NY 10014
 (212) 337-2325 or (FTS) 660-2378
- U.S. Department of Labor, OSHA Region 3 Gateway Building, Suite 2100 3535 Market Street Philadelphia, PA 19104 (215) 596-1201 or (FTS) 596-1201
- U.S. Department of Labor, OSHA Region 4
 1375 Peachtree Street, NE, Suite 587 Atlanta, GA 30367
 (404) 347-3573 or (FTS) 257-3573

- U.S. Department of Labor, OSHA Region 5
 230 South Dearborn Street
 32nd Floor, Room 3244
 Chicago, IL 60604
 (312) 353-2220 or (FTS) 353-2220
- U.S. Department of Labor, OSHA Region 6
 525 Griffin Street, Room 602 Dallas, TX 75202
 (214) 767-4731 or (FTS) 729-4731
- U.S. Department of Labor, OSHA Region 7
 911 Walnut Street Kansas City, MO 64106 (816) 426-5861 or (FTS) 867-5861
- U.S. Department of Labor, OSHA Region 8
 1951 Stout Street Denver, CO 80204
 (303) 844-3061 or (FTS) 564-3061
- U.S. Department of Labor, OSHA Region 9
 71 Stevenson Street, Suite 415 San Francisco, CA 94105 (415) 744-6670 or (FTS) 484-6670
- U.S. Department of Labor, OSHA Region 10
 1111 Third Avenue, Suite 715
 Seattle, WA 98101-3212
 (206) 442-5930 or (FTS) 399-5930

EXHIBIT 4 (continued) Important Telephone Numbers and Addresses

EPA Regional Offices

- U.S. Environmental Protection Agency Region 1
 John F. Kennedy Federal Building Room 2203
 Boston, MA 02203
 (617) 565-3715 or (FTS) 835-3715
- U.S. Environmental Protection Agency Region 2
 Jacob K. Javitz Federal Building 26 Federal Plaza
 New York, NY 10278
 (212) 264-2657 or (FTS) 264-2657
- U.S. Environmental Protection Agency Region 3
 841 Chestnut Building Philadelphia, PA 19107 (215) 597-9800 or (FTS) 597-9800
- U.S. Environmental Protection Agency Region 4
 345 Courtland Street, NE Atlanta, GA 30365
 (404) 347-4727 or (FTS) 257-4727
- U.S. Environmental Protection Agency Region 5
 230 South Dearborn Street Chicago, IL 60604
 (312) 353-2000 or (FTS) 353-2000

- U.S. Environmental Protection Agency Region 6
 1445 Ross Avenue, 9th Floor Dallas, TX 75202
 (214) 655-6444 or (FTS) 255-6444
- U.S. Environmental Protection Agency Region 7
 726 Minnesota Avenue Kansas City, KS 66115
 (913) 551-7000 or (FTS) 276-7000
- U.S. Environmental Protection Agency Region 8
 999 18th Street, Suite 500
 Denver, CO 80202-2405
 (303) 293-1603 or (FTS) 293-1603
- U.S. Environmental Protection Agency Region 9
 215 Fremont Street San Francisco, CA 94105
 (415) 556-6322 or (FTS) 556-6322
- U.S. Environmental Protection Agency Region 10
 1200 6th Avenue
 Seattle, WA 98101
 (206) 442-1200 or (FTS) 399-1200
- Call the Emergency Planning and Community Right-to-Know Information Hotline for the addresses and telephone numbers of state emergency response commissions and local emergency planning committees in your area. The telephone numbers for the Hotline are: toll-free 800-535-7672, or 202-475-9652 in the Washington, D.C. area.